

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

THE DEPARTMENT OF THE TREASURY OF  
THE STATE OF NEW JERSEY AND ITS  
DIVISION OF INVESTMENT, on behalf of  
itself and all others similarly situated,

Plaintiff,

vs.

CLIFFS NATURAL RESOURCES INC.,  
JOSEPH CARRABBA, LAURIE BRLAS,  
TERRY PARADIE, and DAVID B. BLAKE,

Defendants.

Civ. A. No. 14-CV-1031-DAP

Hon. Dan Aaron Polster

**LEAD PLAINTIFF'S UNOPPOSED CONSOLIDATED MOTION FOR LEAVE TO  
FILE: (1) MEMORANDUM IN SUPPORT OF MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT IN EXCESS OF PAGE LIMITATIONS; AND (2)  
MEMORANDUM IN SUPPORT OF LEAD COUNSEL'S MOTION FOR AN AWARD  
OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES IN  
EXCESS OF PAGE LIMITATIONS**

Pursuant to Local Civil Rule 7.1 of the United States District Court for the Northern District of Ohio, Lead Plaintiff The Department of Treasury of the State of New Jersey and Its Division of Investment ("Lead Plaintiff"), by and through its undersigned counsel, hereby moves unopposed for an Order granting Lead Plaintiff: (1) leave to file a thirty (30) page Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement; and (2) leave to file a thirty (30) page Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses. Lead Plaintiff's requests seek 15 pages in excess of the 15-page limit set forth in Local Civil Rule 7.1(f) for memoranda relating to non-dispositive motions. Defendants Cliffs Natural Resources, Inc., Joseph Carrabba, Laurie Brlas, Terrance Paradie, and David B. Blake (collectively, "Defendants") have informed Lead Plaintiff that they consent to this request for 15 additional

pages in the brief to be filed in support of the motion for final approval of class action settlement and the brief to be filed in support of the motion for an award of attorneys' fees and reimbursement of litigation expenses.

Lead Plaintiff requires these 15 additional pages for the final approval brief to address effectively and thoroughly the factual and legal points in support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement including, *inter alia*, the standards for judicial approval of class action settlements, a review of the factors for approval as applied to the facts of this matter, the plan of allocation, the notice that was provided to the settlement class and response of the class to notice of the settlement to date. Similarly, Lead Plaintiff requires the additional 15 pages for the fee application brief to address the factors for the Court's consideration in determining the reasonableness of Lead Counsel's attorney fee and litigation expense reimbursement request including the value of the benefit rendered to the settlement class, a lodestar cross-check, the complexity of the litigation, and the professional skill and standing of Lead Counsel.

Accordingly, Lead Plaintiff respectfully submits that good cause exists for granting Lead Plaintiff the requested 15-page enlargement of both briefs.

WHEREFORE, Lead Plaintiff respectfully requests that the Court grant Lead Plaintiff a 15-page extension of the page limitation for: (1) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement, such that said memorandum may be up to 30 pages in length; and (2) the Memorandum of Law in Support of Lead Counsel's Motion for and Award of Attorneys' Fees and Reimbursement of Litigation Expenses, such that said memorandum may be up to 30 pages in length.

Respectfully submitted,

DATED: May 16, 2016

/s/ Scott D. Simpkins

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed electronically this 16<sup>th</sup> day of May 2016. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: May 16, 2016

*/s/ Scott D. Simpkins*

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